



800 N. Kings Highway • Suite 300 • Cherry Hill, NJ 08034
Tel: 856-779-0300 • Fax: 856-281-3778

Rebecca K. McDowell, Esquire
Direct: 856-324-5014
email: rmcdowell@slgcollect.com

March 9, 2021

Via ECF Only

Hon. Andrew B. Altenburg, Jr.
United States Bankruptcy Court
District of New Jersey
400 Cooper St., 4th Floor
Camden, NJ 08101

RE: Rosa Maria Styles
Case No. 19-32881-ABA
Our File No. 30066

Dear Judge Altenburg,

This matter is set for confirmation on Thursday, March 11, 2021. Thomas Welsh, Jr. ("Welsh") holds first and second mortgages on Debtor's vacation property in Avalon. The most recently-filed plan proposes three alternatives for treating Welsh's claim: 1) he will be paid in full at a sale to close within 60 days of the effective date of the plan, or 2) if the sale does not close, he may buy the property from Debtor for \$2.9 million by crediting her with the amount owed to him and paying the difference; or 3) if neither of these occurs, she will find some other way to pay him in full within 60 days of the effective date of the plan.

Mr. Welsh does not oppose these options; however, he does oppose confirmation of the plan without any safeguards in the event Debtor fails or refuses to carry out these options. Mr. Welsh respectfully requests that the Court order that, in the event any of these three events do not occur as set forth in the Plan, Debtor will surrender the property to Welsh and take no further action to reinstate the stay.

Respectfully submitted,
SALDUTTI LAW GROUP

/s/ Rebecca K. McDowell
REBECCA K. MCDOWELL, ESQUIRE

CC: Anthony Sodono, III, Esq., via ECF
Sari B. Placona, Esq., via ECF
Jeffrey Sponder, Esq., via ECF
Christopher C. Fallon, III, Esq., via ECF
Denise E. Carlon, Esq., via ECF